

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

JODI C. MAHDAVI,

Plaintiff

v.

NEXTGEAR CAPITAL, INC.

Case No. 1:14-cv-0648-TSE-TCB

and

P.A.R. SERVICES, INC.,

Defendants.

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**AFFIDAVIT**

After being duly sworn, the undersigned affiant, Jodi C. Mahdavi, states under oath that:

1. I am over 18 years of age and competent to testify in these matters.
2. I am the owner and title holder of a 2013 BMW 650i Gran Coupe with a vehicle identification number ("VIN") of WBA6B4C53DD097953 (hereinafter the "BMW").
3. On or about March 11, 2014 I entered into a purchase agreement (hereinafter the "Purchase Agreement") with Beltway Auto Brokers, LLC, d/b/a Baltimore Washington Auto Outlet (hereinafter "Beltway Auto"), to purchase the BMW.
4. Based on my personal knowledge, the signature on the Purchase Agreement is not Alex Mahdavi's signature.
5. Upon information and belief, Khazeyer Molavi signed the Purchase Agreement for Beltway Auto.
6. On or about March 11, 2014, pursuant to the Purchase Agreement, I transferred \$23,000.00 from my personal bank account to the bank account of Beltway Auto as the down

payment for the BMW. My husband did not contribute any funds to this account.

7. On April 16, 2014 I entered into a loan agreement with Pentagon Federal Credit Union (“PFCU”) in the amount of \$64,941.70 for the remaining balance of the purchase of the BMW (the “Loan”).

8. I am the only borrower listed on the Loan with Pentagon Federal Credit Union.

9. On or about April 16, 2014, PFCU issued a check, Number 0002877274, in the amount of \$64,941.07 payable to Beltway Auto and Jodi C. Mahdavi, for the balance of the BMW’s purchase price (the “Check”).

10. I endorsed the check and gave it to Beltway Auto, who also endorsed it. Beltway Auto received the proceeds of the Check.

11. I paid Beltway Auto fully for the fair market value of the BMW.

12. I took possession of the BMW.

13. I received a Maryland Certificate of Title for the BMW.

14. Prior to the BMW being repossessed, I had no knowledge of Beltway Auto’s loan with NextGear.

15. Between 2010 and 2013 I bought four vehicles from Beltway Auto: a Cadillac Escalade, a Range Rover, a Dodge Caravan and a Mercedes GLK.

16. Each of these transactions were conducted and financed in the same manner as my purchase of the BMW in this case.

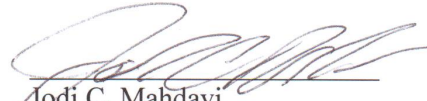
17. My husband brought me the paperwork for the purchase and financing of these vehicles, which I completed.

18. The vehicles were financed by PFCU and TD Bank.

19. I am still liable on the PFCU loan for the BMW and PFCU is demanding monthly

payments from me.

20. The foregoing is true and correct to the best of my personal knowledge and belief.

  
Jodi C. Mahdavi

COMMONWEALTH OF VIRGINIA,  
COUNTY OF Fairfax, to-wit:

The foregoing affidavit was subscribed, sworn to, and acknowledged before me by Jodi C. Mahdavi, this 16<sup>th</sup> day of December 2014.

My Commission expires June, 30, 2016  
Registration No. 7528994 Notary Public

